

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:
STREAM TV NETWORKS, INC., et al.,

Debtors.

CHAPTER 11

Bankr. No. 23-10763 (AMC)

(Jointly Administered)¹

REMBRANDT 3D HOLDING LTD,

Plaintiff,

v.

**WILLIAM A. HOMONY, AS CHAPTER 11
TRUSTEE, et al.,**

Defendants.

Adv. No. 24-00142 (AMC)

**CHAPTER 11 TRUSTEE’S 12(b)(6) MOTION TO DISMISS FOR
FAILURE TO STATE A CLAIM UPON WHICH RELIEF CAN BE GRANTED**

William A. Homony, in his capacity as Chapter 11 Trustee (the “Trustee”) of the bankruptcy estates of Stream TV Networks, Inc. (“Stream”) and Technovative Media Inc. (“Technovative”, and collectively with Stream, the “Debtors”), by and through his undersigned counsel, hereby moves this Honorable Court, pursuant to Rule 12 of the Federal Rules of Civil Procedure, made applicable to this adversary proceeding by Rule 7012 of the Federal Rules of Bankruptcy Procedure, to dismiss the Complaint (Adv. D.I. #1) filed against him in the above-captioned adversary proceeding by plaintiff Rembrandt 3D Holding Ltd.

Pursuant to Local Rule 9014-3(b)(2), for purposes of this Adversary Proceeding, the Trustee consents to entry of a final order or judgment by the Bankruptcy Court if it is determined

¹ On April 11, 2023, this Court entered an order directing joint administration of the above-captioned case and *In re Technovative Media, Inc.*, Case No. 23-10764 (AMC). (Bankr. D.I. #81).

that the court cannot enter a final order or judgment consistent with Article III of the United States Constitution.

Respectfully submitted,

Dated: January 6, 2025

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